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July 20, 2021

Via ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Sohrab Sharma, et al. (18 Cr. 340)
Sohrab "Sam" Sharma

Dear Judge Schofield:

Defendant, Sohrab "Sam" Sharma, by and through undersigned counsel, respectfully requests this Court enter an Order extending his surrender date from July 29, 2021, until November 1, 2021, and reinstatement of home confinement as a condition of bail beginning July 29, 2021, at 2:00 p.m., with all other conditions of bail remaining in effect, and states in support thereof:

1. Mr. Sharma has already been sentenced by the Court and has been on bond and complied with all bond conditions for over three years. Mr. Sharma is neither a flight risk nor a danger to the community.
2. Mr. Sharma is currently scheduled to surrender to FCI-Coleman on July 29, 2021, no later than 2:00 p.m.
3. Since Mr. Sharma's sentencing on March 4, 2021, he has been diagnosed [REDACTED]
[REDACTED] by Dr. Richard Rozencwaig, M.D., of the Orthopedic Care Center in Aventura, Florida. See Composite EXHIBIT A.
4. Mr. Sharma is scheduled to have surgery on September 22, 2021, to repair these issues which are medically necessary. See *Id.* This surgery was scheduled on June 28, 2021.
5. After Mr. Sharma's surgery, he will require a period of time for recovery and physical therapy to ensure his shoulder issues have been properly repaired and fully healed.

6. This is Mr. Sharma's first request for an extension of his surrender date, and it is only due to a significant medical issue for which he is in need of and for which he would not receive the proper treatment for while in the custody of the Bureau of Prisons.

7. Commencing July 29, 2021, at 2:00 p.m., Mr. Sharma is requesting his bond conditions be modified to reinstate the condition of home confinement, during which he may only leave his home for medical or legal purposes as approved in advance by Pretrial Services. Mr. Sharma will not seek any further extensions of his surrender date.

8. Undersigned counsel has conferred with counsels for the government, Samson Enzer and Negar Tekeei, and they take no position on this motion.

9. Accordingly, for the foregoing reasons, it is respectfully requested that this Court enter an Order extending Mr. Sharma's surrender date from July 29, 2021, to November 1, 2021, and modifying his bond conditions to home confinement where he may only leave his home for medical or legal purposes.

Very truly yours,

/s/ Gennaro Cariglio Jr.
GENNARO CARIGLIO JR., ESQ.

cc: All counsel of record
U.S. Probation
U.S. Marshal
Bureau of Prisons

On or before **July 26, 2021**, Pretrial Services shall submit a response to this application, specifically addressing Defendant Sharma's proposed modifications to his conditions of bail. The Government is directed to transmit a copy of this Order and the unredacted application to Pretrial Services.

Dated: July 22, 2021
New York, New York

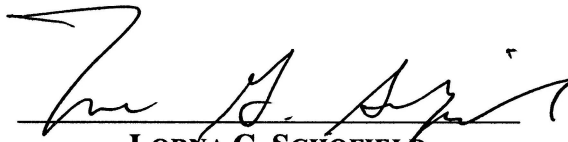

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

EXHIBIT "A"

(Medical Records Redacted)